

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
Shelly R. Sohol) Bankruptcy No. 05-28689
)
) Chapter 7
) Judge Bruce W. Black (Joliet)

To: See Attached List

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **December 6, 2013** at the hour of **9:15 a.m.** or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Bruce W. Black in the Joliet City Hall, 150 West Jefferson Street, 2nd Floor, Joliet, Illinois , or any other judge sitting in his place and stead, and shall then and there present the attached *Final Application of InnovaLaw, P.C. For Allowance of Compensation and Expenses as Counsel for the Trustee*, a copy of which is hereby served upon you. You may appear if you choose.

David E. Grochocinski
Kathleen McGuire
InnovaLaw, P.C.
1900 Ravinia Place
Orland Park IL 60462
(708) 675-1975

CERTIFICATE OF SERVICE

David E. Grochocinski under oath, certifies that he is the one of the attorneys for the movant and that he mailed a copy of this Notice and Motion to the above listed parties from 1900 Ravinia Place, Orland Park, IL 60462 with proper postage prepaid on *October 31, 2013*, before the hour of 5:00 o'clock p.m.

_____/s/David E. Grochocinski
David E. Grochocinski

SERVICE LIST

Sohol- 05-28689

Shelly Sohol
12940 S. Shelly Lane
Plainfield, Illinois 60544

Shelly Sohol
c/o Kent A. Gaertner
Kent A. Gaertner PC
400 S. Country Farm Rd. Suite #330
Wheaton, Illinois 60187
Kgaertner@springerbrown.com
Via Electronic Service

Patrick S. Layng- U.S. Trustee
USTPRegion11.ES.ECF@usdoj.gov
Via Electronic Service

Thomas Sullivan
Law Office of William J. Factor
105 W. Madison Suite 1500
Chicago, Illinois 60602

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:
Shelly Sohol

Debtor(s)

CHAPTER 7 CASE

CASE NO. 05 B 28689

Judge Bruce W. Black

COVER SHEET FOR APPLICATION FOR PROFESSIONAL COMPENSATION

Name of Applicant InnovaLaw, P.C.

Authorized to Provide
Professional Services to TRUSTEE THOMAS B. SULLIVAN

Date of Order Authorizing
Employment: 09/30/2005

Period for Which
Compensation is sought September 19, 2005 through June 8, 2012

Amount of Fees sought \$3546.50

Amount of Expense
Reimbursement sought \$ 0.00

This is an: Interim Application _____ Final Application **X** _____

If this is not the first application filed herein by this professional, disclose as to all prior fee applications:

<u>Date Filed</u>	<u>Period Covered</u>	<u>Total Requested (Fees & Expenses)</u>	<u>Total Allowed</u>
		\$ _____	\$ _____
		\$ _____	\$ _____

The aggregate amount of fees and expenses paid to the Applicant to date for services rendered and expenses

incurred herein is: \$ 0.00

Date: October 31, 2013

By: /s/ David E. Grochocinski
Applicant

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
Shelly R. Sohol)	Bankruptcy No. 05-28689
Debtor(s))	Judge Bruce W. Black
)	

**FINAL APPLICATION OF INNOVALAW, P.C. FOR ALLOWANCE OF
COMPENSATION AND EXPENSES AS COUNSEL FOR THE TRUSTEE**

Now comes InnovaLaw, P.C., as former counsel the Trustee, Thomas B. Sullivan, in the above captioned matter, pursuant to section 331 of Title 11 of the United States Bankruptcy Code, hereby requesting that this Court enter an order allowing \$3209.00 in fees and \$0.00 as reimbursement for costs and expenses incurred by InnovaLaw, P.C. from September 19, 2005 through and including June 8, 2012 (the application period) in connection with legal services InnovaLaw, P.C. provided to the trustee. In support of this Application of InnovaLaw, P.C., for Allowance of Compensation and Reimbursement of Expenses, InnovaLaw, P.C. states as follows:

I. BACKGROUND

- 1) On July 20, 2005, the debtor, Shelly Sohol filed a chapter 7 petition seeking reorganization relief pursuant to the Bankruptcy Code.
- 2) InnovaLaw, P.C. was authorized to represent the trustee pursuant to an order date September 30, 2005 generally before the Court. The primary purpose of the employment was to assist the trustee in matters concerning negotiations with creditors, review and examine claims, file such avoidance actions as may be advisable and to otherwise represent the trustee in matters before the Court.

- 3) No prior funds have been paid to counsel and this is the first application for compensation.
- 4) The rates and hours of the attorneys who have rendered services are attached in a separate schedule delineated in Exhibit A, a copy of which is attached hereto. The rates charged and for which compensation is sought are identical to the rates generally charged by InnovaLaw, P.C. While set forth in the exhibit most of the services were rendered by David P. Loyd (DPL), a former partner of the firm whose hourly rate is \$350.00 per hour and who expended 7.0 hours of time. Kathleen McGuire (KMM), an associate of the firm expended 2.4 hours at her rate of \$ 310.00 per hour.

II. NARRATIVE PROJECT SUMMARY OF FEES

A detailed itemization of the professional time expended in each billing category is attached hereto as Exhibit A.

A. Annuity Matter

InnovaLaw, P.C. rendered services of 7.0 hours, with a time value of \$3209.00, in connection with the tasks in this category that were related to services denoted as Annuity in the Chapter 7 case.

These include the preparation and review of correspondence with attorneys and others concerning the litigation and handling of annuities, telephone conferences with the attorney for New York Life, motions related to the annuities and conducting hearings on such matters. Preparation of an adversary complaint, litigation and eventual settlement of same and resolution of claims related to the annuities.

B. Claims Review

InnovaLaw, P.C. rendered services of 2.40 hours with a time value of \$744.00, in connection with the review of priority claims.

III. NOTICE

Notice of this motion has been sent to the United States Trustee and all other creditors that have requested that notice be served upon them. These include the creditors who have actively participated in the Chapter 7 case as detailed on the notice list attached hereto.

IV. EXPENSES

InnovaLaw, P.C. expended the sum of \$0.00 for necessary expenses for the administration of the estate including overnight delivery, copy charges, postage fees, filing fees and related matters.

V. OTHER MATTERS

InnovaLaw, P.C. has no agreement to share any compensation awarded by the Court with any third party except such sharing as may occur between shareholders or partners of the same partnership or corporation. All services were rendered for and on behalf of the trustee and no other party and the services rendered by applicants were necessary for the administration of the estate.

Kathleen M. McGuire, an attorney with InnovaLaw, P.C., was admitted to practice in the State of Illinois in 1988. Ms. McGuire is a member of the Bar for the Northern and Central Districts of Illinois and concentrates her practice in the area bankruptcy litigation. Prior to her admission to the bar, Ms. McGuire worked as a certified public accountant in the area of taxation.

David P. Lloyd (DPL) was a former principal of Grochocinski, Grochocinski, & Lloyd, Ltd., n/k/a InnovaLaw, P.C. and is a 1982 graduate of DePaul University School of Law. He has concentrated his practice in bankruptcy and insolvency matters and is a licensed attorney with the State of Illinois continuously since graduation.

VI. CONCLUSION

WHEREFORE, InnovaLaw,P.C., requests that the Court enter an order awarding compensation in the sum of \$3209.00 and reimbursement of expenses in the sum of \$0.00 instant.

InnovaLaw, P.C.
As counsel for the Chapter 7 Trustee

By: /s/ David E. Grochocinski
One of its Attorneys

Exhibit A

InnovaLaw, PC
1900 Ravinia Place
Orland Park, IL 60462

Invoice submitted to:
Sohol, Shelly

October 31, 2013

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
<u>Annuity</u>			
9/19/2005 - DPL	Review annuity contract, purpported assignment, scheduels Annuity	0.40 350.00/hr	140.00
12/14/2005 - DPL	Prepare complaint for turnover Annuity	1.50 350.00/hr	525.00
1/13/2006 - DPL	Return call to Joe Berrafoty at New York Life, left message Annuity	0.10 350.00/hr	35.00
1/20/2006 - DPL	Court hearing on initial status Annuity	0.50 350.00/hr	175.00
2/1/2006 - DPL	Telephone conference with NY Life Insurance attorney regarding adversary Annuity	0.20 350.00/hr	70.00
2/10/2006 - DPL	Court hearing on status of adversary Annuity	0.30 350.00/hr	105.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/6/2006 -	DPL	Prepare letter to Gaertner and NY Life attorney regarding execution of judgment	0.40 350.00/hr	140.00
		Annuity		
-	DPL	Prepare agreed judgment	0.50 350.00/hr	175.00
		Annuity		
3/10/2006 -	DPL	Appear in court; status on adversary	0.50 350.00/hr	175.00
		Annuity		
-	DPL	Review signed order from Gaertner	0.20 350.00/hr	70.00
		Annuity		
3/27/2006 -	DPL	Review multiple signed copies of agreed order	0.30 350.00/hr	105.00
		Annuity		
3/31/2006 -	DPL	Appear in court; entry of agreed judgment	0.40 350.00/hr	140.00
		Annuity		
4/10/2006 -	DPL	Prepare letter to Gaertner & Berrafato regarding entry of proposed order	0.40 350.00/hr	140.00
		Annuity		
7/30/2010 -	DPL	Review payment on annuity; compute likelihood of early payment to creditors	0.30 400.00/hr	120.00
		Annuity		
SUBTOTAL:			[6.00	2,115.00]
<u>General Administration</u>				
10/21/2005 -	DPL	Court hearing on motion to extend 727	0.50 350.00/hr	175.00
		General Administration		
11/11/2005 -	DPL	Prepare letter to Gaertner confirming 2004	0.20 350.00/hr	70.00
		General Administration		
5/19/2006 -	DPL	Appear in court; motion to modify stay by Altima Homes	0.30 350.00/hr	105.00
		General Administration		

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	<u>Hrs/Rate</u>	<u>Amount</u>
6/8/2012 - KMM Review claims issues regarding IRS and union to determine allowability	2.40 310.00/hr	744.00
General Administration		
SUBTOTAL:	[3.40	1,094.00]
For professional services rendered	9.40	\$3,209.00
For professional services rendered	9.40	\$3,209.00